



Order Filed on September 2,
2016 by Clerk U.S. Bankruptcy
Court District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

WARREN S. JONES, JR., ESQ. #16294
Law Offices of Warren S. Jones, Jr., LLC
1 Trinity Lane
Mt. Holly New Jersey 08060
(609) 261-8400
Attorney for Secured Creditor Bank of the West

B.603-079

In Re:

John J. Coucoules

Case No.: 12-39520-JNP

Adv. No.:

Hearing Date: 04/26/2016 at 10:00 a.m.

Judge: Jerrold N. Poslusny, Jr.

CONSENT ORDER RE ADEQUATE PROTECTION

The relief set forth on the following pages, numbered two (2) through four is
hereby **ORDERED**.

DATED: September 2, 2016

A handwritten signature in dark ink, appearing to be "J. Poslusny", is written over a horizontal line.

Honorable Jerrold N. Poslusny, Jr.
United States Bankruptcy Court

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Debtor: John J. Coucoules

Case No. 12-39520-JNP

Caption of Order: Consent Order Re Adequate Protection

IT IS HEREBY CONSENTED by and between Movant, Bank of the West, its assignees and/or successors in interest, through its retained counsel, Warren S. Jones, Jr., Esquire, for Prober & Raphael, A Law Corporation, and Debtor John J. Coucoules, through his counsel, Steven N. Taieb, Esquire, as follows:

1. On or before August 1, 2016, Debtor shall pay to Movant, the sum of \$321.47, representing the June 15, 2016 regular monthly payment (\$306.47) and late charge (\$15.00). Said payment shall be tendered to Movant Bank of the West, 2527 Camino Ramon NC-B15-2G-A, San Ramon, CA 94583.

2. Debtor shall maintain the regular monthly payments on Movant's loan obligation, and otherwise comply with all other terms of the subject Contract and Title, including, encumbering the subject collateral, generally described as **2003 Larson 230LXI, VIN LAR70703A303; 2003 EZ Loader Trailer VIN 1ZEAAWTH83A017673; 2003 Volvo Pental 5.0 ID 4012091067**, in a timely fashion, commencing with the July 15, 2016 payment. Payments on Movant's loan obligation shall be made to Movant Bank of the West, 2527 Camino Ramon NC-B15-2G-A, San Ramon, CA 94583.

3. Debtor shall pay to Movant the sum of \$526.00, representing attorneys' fees (\$350.00) and filing fee (\$176.00) late charges. Said arrearages shall be paid through the Chapter 13 Plan.

4. In the event Debtor fails to timely and properly comply with the payments set forth in Paragraph 1, 2 or 3 hereinabove, or any other terms of the subject Contract and Title, Movant may file and serve a Declaration Re Breach of Condition on Debtor and Debtor's counsel. Debtor shall have thirty (30) days from the date of service of said Declaration within

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which to cure the existing breach. A cure of the breach shall include, but not be limited to, any late charges, costs and/or advances due pursuant to the Note. If Debtor fails to do so, then on the thirty-first (31st) day, Movant shall serve and lodge a Declaration Re Non-Compliance along with a final Order for Relief from the Automatic Stay. Upon the entry of said Order, the Automatic Stay in the above-entitled bankruptcy proceeding shall be immediately vacated and extinguished for all purposes as to Movant, allowing Movant to proceed with foreclosure of the subject Property, pursuant to applicable State law.

5. Any funds received by Movant, which are subsequently returned for non-sufficient funds, including funds received and applied prior to the terms of this Order, shall be subject to the default provisions contained herein.

6. Should Movant obtain relief from the automatic stay due to a breach of the terms of this Order, any Order for Relief from the Automatic Stay shall provide for the 14-day stay described by Bankruptcy Rule 4001(a)(3) to be waived.

7. In the event the instant bankruptcy proceeding is dismissed or discharged, this Consent Order shall be terminated and have no further force or effect.

The movant shall serve this order on the debtor, any trustee and any other party who entered an appearance on the motion.

By 

Warren S. Jones, Jr. #16294

Retained Counsel

Law Offices of Warren S. Jones, Jr., LLC

1 Trinity Lane

Mt. Holly New Jersey 08060

(609) 261-8400

B.603-079

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By 

Steven N. Taieb

Attorney for Debtor

Law Office of Steven Taieb

1155 Route 73, Suite 11

Mount Laurel, New Jersey 08054

(856) 235-4994

CERTIFICATE OF MAILING

I hereby certify that on _____, 2016, a copy of the
foregoing Order was served on each of the following: Movant.

JAMES J. WALDRON, CLERK

Certificate of Notice Page 5 of 5
United States Bankruptcy Court
District of New Jersey

In re:
John J. Coucoules
Debtor

Case No. 12-39520-JNP
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-1

User: admin
Form ID: pdf903

Page 1 of 1
Total Noticed: 1

Date Rcvd: Sep 02, 2016

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 04, 2016.

db +John J. Coucoules, 14 East Woodcrest Avenue, Maple Shade, NJ 08052-3343

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Sep 04, 2016

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on September 2, 2016 at the address(es) listed below:

Andrew L. Spivack on behalf of Creditor M & T Bank Servicer For Lakeview Loan Servicing
nj.bkecf@fedphe.com
Andrew L. Spivack on behalf of Creditor Bank of America, N.A., as successor by merger to BAC
Home Loans Servicing, LP fka Countrywide Home Loans Servicing, LP nj.bkecf@fedphe.com
Denise E. Carlon on behalf of Creditor Lakeview Loan Servicing, LLC
bankruptcynotice@zuckergoldberg.com, bkgroup@kmlawgroup.com
Isabel C. Balboa ecfmail@standingtrustee.com, summarymail@standingtrustee.com
Isabel C. Balboa on behalf of Trustee Isabel C. Balboa ecfmail@standingtrustee.com,
summarymail@standingtrustee.com
Joshua I. Goldman on behalf of Creditor Lakeview Loan Servicing, LLC jgoldman@kmlawgroup.com,
bkgroup@kmlawgroup.com
Joshua I. Goldman on behalf of Creditor M&T Bank jgoldman@kmlawgroup.com,
bkgroup@kmlawgroup.com
Joshua I. Goldman on behalf of Creditor M & T Bank Servicer For Lakeview Loan Servicing
jgoldman@kmlawgroup.com, bkgroup@kmlawgroup.com
Steven N. Taieb on behalf of Debtor John J. Coucoules staieb@comcast.net
Warren S. Jones, Jr. on behalf of Creditor Bank Of The West wsjonesesq@verizon.net,
bestcasews@gmail.com

TOTAL: 10